



DEPARTMENT OF THE ARMY
SAVANNAH DISTRICT, CORPS OF ENGINEERS
P.O. BOX 889
SAVANNAH, GEORGIA 31402-0889

DEC 10 2008

Regulatory Division
200701670

JOINT PUBLIC NOTICE
Savannah District/State of Georgia

The Savannah District has received an application for a Department of the Army Permit, pursuant to Section 404 of the Clean Water Act (33 U.S.C. 1344), as follows:

Application Number: 200701670

Applicant: Georgia IV, LLC
Attn: Mr. John J. Allen
7220 Financial Way
Suite 400
Jacksonville, Florida 32256

Agent: Environmental Services Inc.
Attn: Michael DeMell
413 East Liberty Street
Savannah, Georgia 31401

Location of Proposed Work: The project site is located off Highway 40, east of Interstate 95 in Kingsland, Camden County, Georgia. The coordinates of the approximate center-point of the site are 30.7782° north, 81.6269° west. The project site encompasses 87.88 acres.

Description of Work Subject to the Jurisdiction of the US Army Corps of Engineers: The applicant is requesting authorization for placement of fill in 5.50 acres of jurisdictional wetlands and 4.70 acres of non-jurisdictional wetlands for the purpose of constructing a business park. Of the jurisdictional impacts, the applicant is proposing 4.30 acres of impact as a result of the development footprint, including space to align buildings, loading docks, and aprons, with ingress and egress points. Also, the applicant is proposing to impact 1.20 acres of jurisdictional wetland for roadway corridors. The non-jurisdictional isolated impacts would consist of 4.10 acres for development footprint and 0.60 acres for roadway corridors. To mitigate for impacts of waters of the US, the applicant would purchase 58.54 credits from the Offerman Wetland Mitigation Bank. Please see applicant's Supporting Documentation for more information. The views expressed by the applicant are not necessarily those of US Army Corps of Engineers (USACE).

BACKGROUND

This Joint Public Notice announces a request for authorizations from both the US Army Corps of Engineers and the State of Georgia. The applicant's proposed work may also require local governmental approval.

STATE OF GEORGIA

Water Quality Certification: The Georgia Department of Natural Resources, Environmental Protection Division, intends to certify this project at the end of 30 days in accordance with the provisions of Section 401 of the Clean Water Act, which is required by an applicant for a Federal Permit to conduct an activity in, on, or adjacent to the waters of the State of Georgia. Copies of the application and supporting documents relative to a specific application will be available for review and copying at the office of the Georgia Department of Natural Resources, Environmental Protection Division, Water Protection Branch, 4220 International Parkway, Suite 101, Atlanta, Georgia 30354, during regular office hours. A copier machine is available for public use at a charge of 25 cents per page. Any person who desires to comment, object, or request a public hearing relative to State Water Quality Certification must do so within 30 days of the State's receipt of application in writing and state the reasons or basis of objections or request for a hearing. The application can also be seen in the Savannah District US Army Corps of Engineers, Regulatory Branch, 100 West Oglethorpe Avenue, Savannah, Georgia.

State-owned Property and Resources: The applicant may also require assent from the State of Georgia which may be in the form of a license, easement, lease, permit, or other appropriate instrument.

Georgia Coastal Management Program: Prior to the Savannah District Engineer making a final permit decision on this application, the project must be certified by the Georgia Department of Natural Resources, Coastal Resources Division, to be consistent with applicable provisions of the State of Georgia Coastal Management Program (15 CFR 930). Anyone wishing to comment on Coastal Management Program certification of this project should submit comments in writing within 30 days of the date of this notice to the Federal Consistency Coordinator, Ecological Services Section, Coastal Resources Division, Georgia Department of Natural Resources, One Conservation Way, Brunswick, Georgia 31523-8600 (Telephone 912-264-7218).

US ARMY CORPS OF ENGINEERS

The Savannah District must consider the purpose and the impacts of the applicant's proposed work, prior to a decision on issuance of a Department of the Army Permit.

Cultural Resources Assessment: Included with the application is a copy of an October 2008, cultural resource survey prepared by Environmental Services Inc. (ESI) of the Kingsland Business Park property in Camden County. A review of the document will be conducted by the USACE to make an effects determination. In turn, the survey and effects determination will be coordinated with Georgia Department of Natural Resources, Historic Preservation Division.

Endangered Species: Pursuant to Section 7(c) of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.), we request from the US Department of the Interior, Fish and Wildlife Service and the US Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries Service, or any other interested party, information on whether any species listed or proposed for listing may be present in the area.

Public Interest Review: The decision whether to issue a permit will be based on an evaluation of the probable impact including cumulative impacts of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefit which reasonably may be expected to accrue from the proposal must be balanced against its reasonably foreseeable detriments. All factors which may be relevant to the proposal will be considered including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership and in general, the needs and welfare of the people.

Consideration of Public Comments: The US Army Corps of Engineers is soliciting comments from the public: federal, state, and local agencies and officials; Native American Tribes; and other interested parties in order to consider and evaluate the impacts of this proposed activity. Any comments received will be considered by the US Army Corps of Engineers to determine whether to issue, modify, condition or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity.

Application of Section 404(b)(1) Guidelines: The proposed activity involves the discharge of dredged or fill material into the waters of the United States. The Savannah District's evaluation of the impact of the activity on the public interest will include application of the guidelines promulgated by the Administrator, Environmental Protection Agency, under the authority of Section 404(b) of the Clean Water Act.

The applicant states that off-site alternatives were considered as locations for this project. The applicant states that this site was chosen based on the project's purpose and need. The applicant evaluated the alternatives by: size, zoning, environmental constraints, highway access, available infrastructure and adjacent property use. Also, the applicant states the impacts were avoided and minimized by designing the site plans to reduce impact to waters of the United States. Mitigation for proposed impacts would be calculated taking into consideration: watershed, duration of effect, existing conditions, function, value, preventability and rarity. The applicant states that 58.54 credits would be purchased from Offerman Wetland Mitigation Bank.

Public Hearing: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application for a Department of the Army Permit. Requests for public hearings shall state, with particularity, the reasons for requesting a public hearing. The decision whether to hold a public hearing is at the discretion of the District Engineer, or his designated appointee, based on the need for additional substantial information necessary in evaluating the proposed project.

Comment Period: Anyone wishing to comment on this application for a Department of the Army Permit should submit comments in writing to the Commander, US Army Corps of Engineers, Savannah District, Attention: Regulatory Division, Post Office Box 889, Savannah, Georgia 31402-0889, no later than 30 days from the date of this notice. Please refer to the applicant's name and the application number in your comments.

If you have any further questions concerning this matter, please contact Anthony Jernigan at (912) 652-5018.

Enclosures

1. Applicant's Supporting Documentation
2. Location Map
3. Proposed Layout and Wetland Impact Map

2.0 SUPPORTING DOCUMENTATION

INTRODUCTION

The Kingsland Business Park is a proposed warehouse development located 2 miles southeast of Kingsland, Camden County, Georgia (Appendix A). The tract consists of ± 140.69 -acres with ± 93.16 -acres of uplands and ± 42.83 -acres of wetlands. Of the 140-acre tract, the proposed project limits consists of ± 88.17 -acres of undeveloped land and is hereby referred to as The Kingsland Business Park or the property. The current owner of the proposed project, and hereby referred to as the applicant, is Georgia IV, LLC.

The subject property can be easily accessed from Georgia Highway 40 and is located between Kingsland and St. Marys, Georgia. The property is also only 2-miles from Interstate-95. The properties location being adjacent to a major highway and in close proximity to a major north south artery, Interstate-95 provides excellent accessibility. The property is bound to the north by existing development located along the Highway 40 corridor. Drainage canals and a forested wetland serve as the remaining boundaries for the property (Appendix C). A listing of adjacent landowners is included in Appendix B.

The subject property contains both jurisdictional and isolated non-jurisdictional wetlands as verified by the U.S. Army Corps of Engineers (CE) see Appendix D for a copy of the valid Jurisdictional Determination for this parcel. This project area consists of approximately ± 88.17 -acres with ± 69.94 -acres of uplands, and ± 17.94 -acres of wetlands. This individual permit application accounts for both jurisdictional and isolated non-jurisdictional necessary wetland impacts.

The proposed business park has been designed to provide over 940,000 square feet of warehouse space (with three separate buildings) with the necessary infrastructure including trailer/container parking, loading docks, tractor trailer turn-around areas, employee and visitor parking, stormwater management, a lift station, and roadways for the safe ingress and egress of all vehicles accessing these facilities. In order to meet building and parking requirements for this business park, and provide the most

productive use of the land, the project proposes to impact ± 5.50 -acres of the jurisdictional wetlands and ± 4.70 -acres of non-jurisdictional isolated wetlands, in order to meet project objectives. The proposed jurisdictional wetland impacts are located along southwester portions of the property adjacent to the existing drainage canal and property boundary. The proposed isolated non-jurisdictional wetland impacts are spread out over much of the site as these wetlands are scattered throughout the parcel. Given the need for large building and infrastructure footprints, necessary for warehouse developments, the proposed wetland impacts are vitally important in attaining the projects goals and make the entire development economically and logistically feasible. Compensation for the loss of impacted wetlands will be provided for through the purchase of off-site wetland mitigation bank credits from Offerman Wetland Mitigation Bank. Due to secondary and cumulative effects regarding the impacts to isolated non-jurisdictional wetlands, the applicant also proposes to mitigate for these isolated non-jurisdictional wetlands through the purchase of wetland credits as referenced above. The details of the proposed wetland impacts are outlined in the Proposed Impacts section of this report and the compensatory mitigation plan is outlined herein (Section 3.0).

The proposed Kingsland Business Park incorporates an on-site stormwater management system. The applicant, Thomas & Hutton Engineering Company (T&H), and Environmental Services, Inc. (ESI) have prepared this individual permit application to demonstrate the minimization of unavoidable wetland impacts associated with this proposed project. The attached plan and supporting documentation provides the necessary information for compliance with Section 404(b)(1) guidelines of the Clean Water Act.

PURPOSE AND NEED

The property is strategically located adjacent to Highway 40 and within close proximity to Interstate-95. With this interstate and highway access this property becomes a viable option to provide service for ports in Brunswick, Georgia and Jacksonville, Florida, with both ports being almost equidistant from the property. The proposed business park being located only 4-miles away from Kings Bay Naval Base adds to the potential customer base. The business park can provide ancillary support for base operations and for contractors servicing the base. The proposed development will provide both new

commerce opportunities and significant job opportunities in the logistics industry with ample facilities to aid in the distribution and storage of goods locally and from around the world.

There is a recognized demand for warehouse space in this region as both the ports in Brunswick and Jacksonville have expanded to accommodate the increase in the global import export business. Kings Bay Naval Base is poised to expand to make up for the closing of other military bases around the country. The base expansion provides for more than just opportunities to service the military, but also the ability to supply services associated with an increase in commerce that comes with a significant growth in population. Regardless of the source for the increase in population whether it be military, retirement, or local growth, the demand for services along with coastal Georgia is growing. In order to keep pace with this need more warehouse/distribution/storage space is necessary.

With the influx of commercial entities attempting to establish themselves in the area, to provide the supplies and services in this region, the need exists for secure, efficient and easily accessible distribution/storage facilities. Accessibility, affordable land acquisition costs, minimal and/or avoidable environmental constraints, along with the presence of an ample workforce were all factors in deciding to proceed with agency coordination and construction of this proposed development.

The wetland impacts associated with the proposed business park have been reduced and are necessary to provide for the increasing need for warehouse space in this area/region. No impact will disconnect any part of the system from another. Furthermore, given the current condition of the wetlands in question impacts are not expected to result in substantial ecological loss. The wetlands remaining onsite are likely what remained after the drainage improvements, in the form of drainage canals, occurred within proximity to this parcel. Secondly this parcel has long been managed by a commercial timber company and has been impacted by past and present silvicultural practices. Currently the wetlands onsite vary in age but little in composition. Most of the wetlands onsite are dominated by early successional species with decreased ecological benefit. Proposed compensatory mitigation for these unavoidable impacts can be found in Section 3.0.

Site Selection

The minimum criteria required by the proposed project are presented below and followed by their respective evaluation parameters.

- Size
- Zoning
- Environmental Constraints
- Highway Access
- Available Infrastructure
- Adjacent Property Use

Size

The proposed development will be comprised of three large buildings, loading docks with adequate tractor trailer maneuvering areas, trailer storage, roadways, and parking. Thus, the tract size is dictated by the sizes of the buildings, required parking, roads, etc. The buildings alone will account for over 21-acres of the project, therefore, for any site to be considered it must be greater than 50 acres in size and contain a considerable amount of uplands to be feasible for multiple warehouse facilities. The proposed project property meets this requirement.

Highway Access

Proximity to a major interstate/highway is a necessity to facilitate logistic operations efficiently and productively. Proximity as well as ease-of-navigation for users of the business park to major road ways is also a major priority. The applicants' business park is accessed by Highway 40, a four lane controlled access divided highway, and close to two other four lane controlled access divided highways, one providing access to another exit/on ramp for Interstate 95 near the Georgia Florida State line. Utilizing Highway 40, Interstate-95 is only 2-miles west of the property.

Zoning

Appropriate zoning must be in place or easily amended to meet the needs of the project. Residential and other zoning restrictions were unacceptable. The subject property is currently zoned IH (Industrial), thereby meeting the applicants' zoning requirements and was a determining factor when the applicant purchased the property. Given that proper zoning is in place for this tract of land adjacent to a major highway, with interstate access, and was available for purchase, the applicant invested in the property

for the purpose of this business park. The zoning requirements have been met for proposed project.

Available Infrastructure

It is cost prohibitive for the applicant to have utilities brought in to the project site from long distances; therefore, only sites with nearby access to water, sewer and power were considered. Due to the existing commercial developments adjacent to the property along with the extensive growth in this area, utilities are available to service this property. The proposed development site does satisfy utility requirements.

Environmental Constraints

The applicant utilized a professional project planning team to minimize unavoidable wetland impacts, while continuing to meet the purpose and need of this particular project. The extent and location of the onsite wetlands made siting the proposed buildings and infrastructure a challenge. The planners requested that ESI evaluate the site plan and comment on the corresponding permit implications. Being extremely familiar with the proposed project site, ESI is intimately aware of the nature of the onsite wetlands. Most if not all wetlands located within the property has been impacted from the drainage improvement projects i.e. drainage canals along the properties borders, and past and present silvicultural practices, therefore considered by ESI to be hydrologically and vegetatively impaired thereby effecting their natural functions. Furthermore, the applicant will mitigate the impacts to isolated non-jurisdictional and jurisdictional wetland areas by purchasing wetland credits from an approved wetland mitigation bank (Offerman Wetland Mitigation Bank) that services this area. There have been changes made to previous site plans reducing building size in order to reduce wetland impacts, thus generating the site plan proposed herein. No other environmental constraints (hazardous materials, Threatened & Endangered species, historic properties, etc.), exists on this property, therefore it was determined that environmental limitations did not outweigh the benefits of the proposed project.

Adjacent Property Use

The northern boundary of the property is comprised of commercial parcels utilizing highway frontage along the Highway 40 corridor. The site is bordered by forested lands along the remaining boundaries. Much of the area along the Highway 40 corridor is

already developed for commercial purposes with several new commercial entities added within the last few years. The proliferation trend in the service/merchandise sector is only strengthened by the amount of population growth slated for this area. The proposed development site meets this criterion.

ALTERNATIVE ANALYSIS

The Applicant recognizes that non-water dependent projects such as industrial developments are presumed to have upland alternatives unless demonstrated otherwise. However, since the proposed site is the only one that met site selection criteria and will enable the applicant to be truly competitive in the market they seek; viable alternatives that do and do not involve the subject property are discussed below.

ALTERNATIVE 1: ALTERNATE SITE DEVELOPMENT

By utilizing this property the applicant possesses a real opportunity to provide for the industrial and logistics needs that are in high demand in this region. There are many factors/constraints for a property to be considered suitable for industrial development. That being said the availability of tracts, similar in size with comparable site attributes in the same service area with a strategic location is extremely limited. Direct highway/interstate access, within an area with a demand for the proposed services, is a must in order to provide the means necessary for tractor trailers to safely and efficiently access the facilities. The applicant evaluated numerous parcels within two states from the Jacksonville, Florida area to coastal Georgia. Of the parcels evaluated few of them met the size and locale requirements and were available for sale. Four parcels, of these two were located in Florida; the other two sites were located in Georgia (Appendix G-1). The sites outlined below were evaluated during the site selection process for this project.

Alternate Site A: This ±210-acre site is located near Jacksonville, Florida and marketed with ±147-acres of usable land and ±63-acres of wetlands. This site meets most if not all of the site selection criteria. This site being located just north of Jacksonville puts it in the extreme southern region of the desired service area greatly limiting potential end users especially Brunswick Port in Georgia. The price of this site at ±\$170,000/usable acre or \$25 million making this site the highest of all the tracts evaluated. In order to maximize an investment of this magnitude wetland impacts,

doubling those being proposed herein, would be necessary to increase the total amount of usable acreage for this site to fit within the confines of the applicants project goals. With the limited service area and exorbitant asking price this site did not fulfill the applicants desire to provide safe, efficient, and cost effective logistical solutions within their proposed service area.

Alternate Site B: Is a ±319-acre site also located near Jacksonville, Florida with ±39.75- contiguous industrial acres ready for immediate development. Given the limited availability of contiguous upland acreage, the fragmentation of the site presents numerous obstacles when considered for industrial purposes. With less than 40-acres of contiguous uplands ready for immediate development, this parcel does not meet the size criteria stated above in the site selection portion of this document. In order to amass the land necessary, to facilitate the large footprint for industrial developments, significant wetland impacts would be necessary. This site is also located in the extreme southern range of the desired service area for Brunswick Port in Georgia, once again limiting potential end users. The cost of this site is \$152,500/usable acre making it second only to site A in terms of price. Site B has several limiting factors among which are the size of the immediately available developable lands, the limited service area, along with the high price per usable acre. The applicant's goal to provide over 900,000 square feet of industrial space could not be accomplished given the size constraints of Site B thereby limiting their ability to recoup the sizable investment necessary to purchase the property.

Alternate Site C: Site C is ±102-acres in size and located near Kingsland, Georgia and is marketed as containing ±79-usable acres and ±23-acres of marsh/riverfront. This site is strategically located mid way of the desired service area. However there are other site constraints, visible on current aerials, that potentially reduce the amount of usable acreage. A large borrow pit now occupies a majority of the southwestern portion of this tract along with some undefined wetland areas to the west, north, and along the eastern boundary. These areas, although not verified as wetlands, raise concerns given the signature produced on the true color aerials. The total acreage of this borrow pit is estimated to be ±5-acres further reducing the usable acreage onsite. A portion of the property boundary of Site C is the Crooked River and the salt marsh associated with it. The areas of this site that are adjacent to salt marsh would be subject to a 25' state warm water buffer originating from the Georgia Department of Natural Resources (DNR)

extent of jurisdiction. This also further reduces the available usable acreage. With the current desire for home sites adjoining salt marsh the use of this property for industrial purposes may not be the best use of this parcel. Typically land in coastal Georgia with marsh frontage commands a higher per acre sale price than parcels lacking these resources. To further hinder this site's development potential a 200'-wide power line easement extending north to south near the eastern boundary of the site. This easement would significantly restrict potential development plans for approximately 6-7-acres of this site. The reduction in usable acreage described above would necessitate the use of every acre including the suspect wetland areas (outside of the salt marsh areas) in order for the site to be large enough to support industrial development. The impact to these wetlands would be at or above the percentage proposed on the preferred site. These site constraints afford a property boundary that is not conducive to the applicant's development goals. Upgrades to utilities would be required to support industrial development further escalating the necessary financial commitment.

The applicant exhausted the real estate resources available looking for available lands over 80-acres in size within their area of interest. There were only two sites available within this area of interest, Site C and the preferred alternative. Based on the site requirements, there are no other suitable industrial development sites available that would avoid the need to impact on-site wetlands. Alternative offsite developments were not considered a more viable option than the preferred.

ALTERNATIVE 2: DEVELOP SITE AS PROPOSED

Numerous meetings have also been conducted with the project team to discuss feasible options and the effect of these options on the development goals and the subject property's ecological state. Wetland impacts have decreased from the first site plan, by re-configuring building site footprints and layouts to avoid wetlands altogether when ever possible. Modifications to the site plan were performed to move the stormwater retention ponds out of the jurisdictional wetlands. Due to the EPA and CE's negative stances concerning stormwater related jurisdictional wetland impacts and being able to demonstrate compliance with 404(b)(1) guidelines, the applicant re-designed the site plan in this regard.

Avoidance and minimization to develop site as proposed.

This plan initially included impacts to jurisdictional wetlands for stormwater impacts along with impacts to the largest wetland to the east. These impacts were re-evaluated and a plan was devised that made these impacts unnecessary for the development's overall success. Based upon demand for development within and surrounding the subject property it is the opinion of the design team that further reduction of impacts would result in economic loss to the applicant with little or no direct effect on the overall ecological values of the subject property. Please note long-term silvicultural activities and past drainage improvement projects have significantly affected the overall ecological function of the existing onsite wetlands.

In order to meet overall project objectives, the developable areas must have direct highway and Interstate access. Building layout, interior road and utility crossings, tractor trailer/loading dock aprons, and parking areas must be master-planned with one another to maximize efficiency, reduce construction costs and minimize adverse wetland impacts. This proposed development has been designed to provide warehouse space to fit the current and planned growth in the area. Therefore, the applicants proposed plan utilizes the most efficient layout of infrastructure that provides maximum benefit while abiding by applicable regulations including the Clean Water Act of 1972.

ALTERNATIVE 4: NO BUILD

The no-build alternative will result in the loss of great economic potential for the applicant and the surrounding community. The applicant purchased the property after heavily evaluating the pros and cons of this parcel along with several others. Numerous jobs and substantial tax revenue would be lost. The no-build alternative will not help foster the on going growth in this area. The no-build alternative is not a viable option for the applicant.

PROJECT AREA EXISTING CONDITIONS

Four habitat types were identified on the subject property:

- ☐ Logged Uplands
- ☐ Pine Plantation Uplands
- ☐ Forested Wetlands
- ☐ Isolated Wetlands

Descriptions of these habitat types are presented below.

Logged Uplands

The north western portion of the site was logged within the last 4-5 years. These areas were not clearcut but little vegetation was left undisturbed with scattered small non merchantable trees left in various impaired condition. These areas have not been replanted and are in varying stages of natural regeneration and include slash pine (*Pinus ellioti*), sweetgum (*Liquidambar styraciflua*), sweet bay (*Magnolia virginiana*), water oak (*Quercus nigra*), wax myrtle (*Myrica cerifera*), gallberry (*Ilex glabra*), dog fennel (*Eupatorium compositifolium*), bracken fern (*Pteridium aquilinum*), and grape (*Vitis rotundifolia*).

Pine Plantation Uplands

The uplands throughout the remainder of the tract are described as pine plantations. This habitat type is described as primarily slash pine with a mixed assemblage of sweetgum (*Liquidambar styraciflua*), red maple (*Acer rubrum*), bracken fern, and thick saw palmetto (*Serenoa repens*).

Forested Wetlands

The forested wetlands vegetation unit encompasses most of the wetlands onsite. These areas consist of maturing vegetation comprised of loblolly bay (*Gordonia lasianthus*), sweetgum, red bay (*Persea palustris*), sweet bay, slash pine, bald cypress (*Taxodium distichum*), red maple, black gum (*Nyssa sylvatica*), fetterbush (*Lyonia lucida*), and netted chainfern (*Woodwardia aereolata*).

Isolated Wetlands

There are six isolated wetlands on the property three of which has been logged recently and the other consisting of standing vegetation of varying ages. The three isolated wetlands in the north western section of the project area have been recently logged, but were not clearcut, as a result the little if any remaining vegetation was left undisturbed with scattered small non merchantable trees left in various impaired condition. The other three isolated wetlands consist of standing maturing vegetation similar in composition as the forested wetlands described above.

Proposed Impacts

Out of a total area of ± 140.69 -acres, the proposed business park will unavoidably impact ± 5.50 -acres of jurisdictional wetlands, 3.9% of the total acreage (Appendix C). The remaining wetlands on the site (± 37.33 -acres) are not proposed for impact. Therefore, the applicant proposes to impact 12.8% of the onsite, jurisdictional wetlands. The project will also necessitate the fill of ± 4.70 -acres of non-jurisdictional isolated wetlands, 3.3% of the total acreage. Most of the wetlands proposed for impact represent lower quality jurisdictional and non-jurisdictional wetlands. Wetland impacts associated with development will consist of four categories:

- ❑ Jurisdictional Wetland Development Impacts - (± 4.30 -acres)
- ❑ Jurisdictional Wetland Roadway Impacts - (± 1.20 -acres)
- ❑ Isolated Wetland Development Impacts - (± 4.10 -acre)
- ❑ Isolated Wetland Roadway Impacts - (± 0.60 -acre)

Jurisdictional Wetland Development Impacts

In order to implement an efficient warehouse development large building and infrastructure footprints are required. Therefore, the applicant is proposing to impact ± 4.30 -acres of jurisdictional wetlands as a result of the necessary development footprint. These impacts are necessary to provide the contiguous space necessary to align buildings, loading docks, and aprons, with the ingress and egress points. The nature of site operations requires a large paved compound so that tractor-trailers can safely maneuver to and from the individual loading docks. The expansive paved compound allows the space necessary so that the tractor-trailers are not impeded by cramped

spaces and line-of-sight for the drivers to the dock is easily established. In order to facilitate the stormwater management plan, and to provide a suitable building pad for the buildings, loading docks and tractor-trailer concourse, the elevation of the site needs to be altered. The existing site elevations range between 13' to 20'. The finished grade for the building pad is planned at 23.5'. Therefore to accommodate this finished grade in the lower areas of the site a significant amount of fill is planned. For this amount of fill to be stable a 4 to 1 side slope is planned on all building pads and fill areas. The 4 to 1 side slope will extend past the edge of the curb and gutter system for the loading docks and travel concourses. This extended footprint is necessary to provide a stable building pad, insuring a sound base for construction, and also to reduce/control erosion and runoff potential.

Jurisdictional Wetland Roadway Impacts

In order to complement and complete an efficient warehouse development, the applicant must provide the most efficient and safe roadways throughout the property. Therefore, the applicant is proposing to impact ± 1.20 -acres of jurisdictional wetlands for roadway corridors. The existing site elevations range between 13' to 20'. The roadways for the proposed industrial complex have to be near grade with the traffic concourse for each building given laden tractor-trailers restricted ability to maneuver abrupt grade changes. The existing site elevations will require substantial fill in the lower area, within the roadway corridors, to accomplish this design parameter. This necessitates a 4 to 1 slope for roadway fill to establish a suitable roadbed and a larger footprint for roadway corridors. Due to the scope of the proposed project, and the location of the wetlands, the proposed impacts are unavoidable to meet the intended goal of this project. Steps were taken to realign the proposed roadways, where possible, to reduce wetland impacts.

Isolated Wetland Development Impact

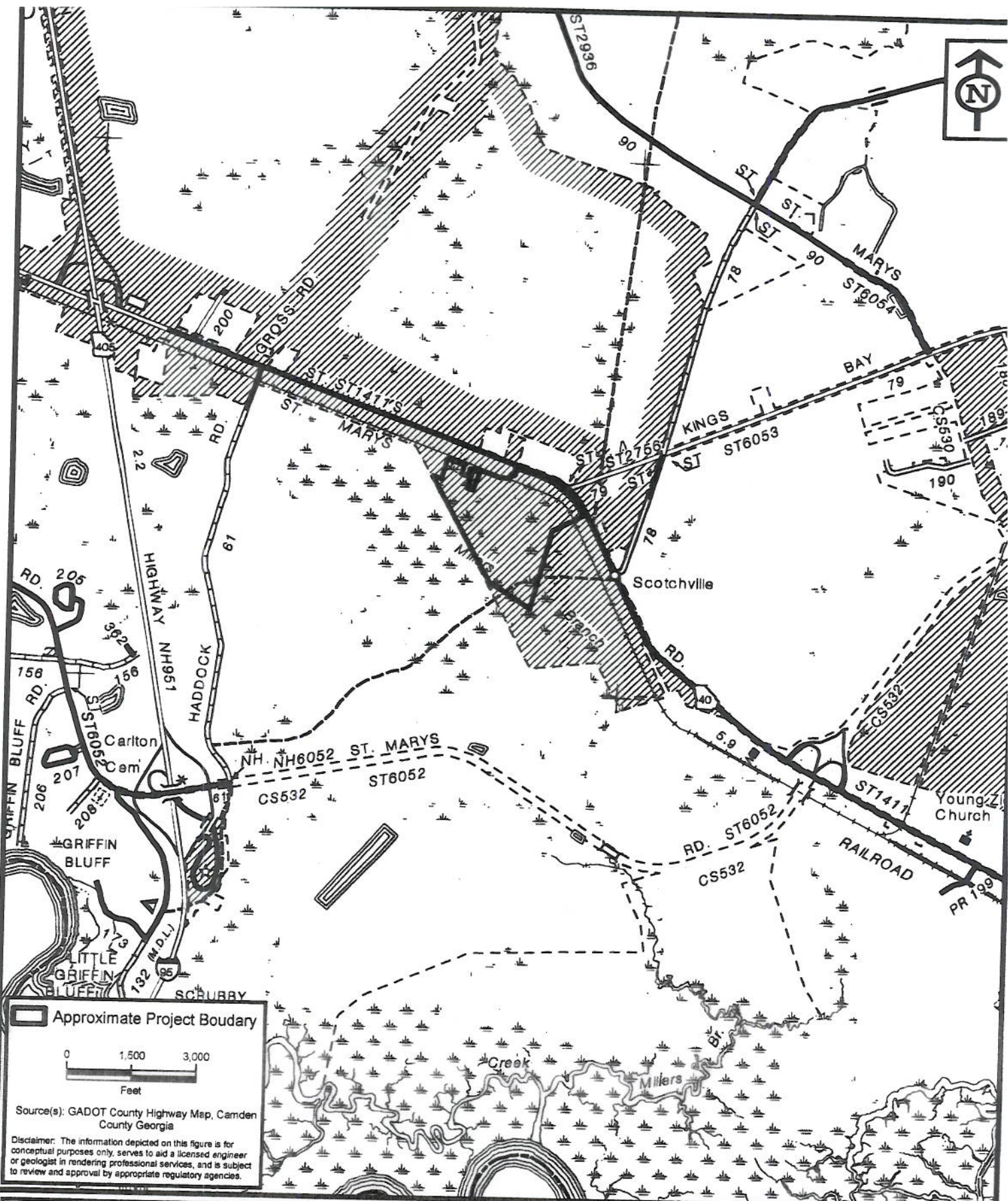
In order to facilitate requirements of the project, ± 4.10 -acres of non-jurisdictional isolated wetland development impacts. The aforementioned wetlands were determined by the U.S. Army Corps of Engineers (CE) to be isolated, Regulatory Branch No. 200701670. A copy of this determination is located in Appendix D. Additionally, in concurrence with recent CE guidelines, the project area is not located within the 100-year floodplain, and therefore the wetlands remain isolated under current CE guidelines.

Isolated Wetland Roadway Impact

In order to facilitate requirements of the project, ±0.60-acres of non-jurisdictional isolated wetland roadway impacts. The aforementioned wetlands were determined by the U.S. Army Corps of Engineers (CE) to be isolated, Regulatory Branch No. 200701670. A copy of this determination is located in Appendix D. Additionally, in concurrence with recent CE guidelines, the project area is not located within the 100-year floodplain, and therefore the wetlands remain isolated under current CE guidelines.

Wetland Impact Summary

Implementation of the proposed plan will result in permanent wetland impacts. The conceptual plan maximizes development of the upland acreage and proposes to utilize minimal encroachment into the wetlands, where necessary, to facilitate the goals of the proposed development. As made evident in this document, wetland impacts have been avoided and minimized. Following multiple project re-designs and in accordance with Section 404(b)(1) guidelines, avoidance and minimization practices were employed to the greatest extent possible while still creating a viable project.



**ENVIRONMENTAL
SERVICES, INC.**

413 East Liberty Street
Savannah, Georgia 31401
(912) 236-4711
(912) 236-3668 Fax
www.environmentalservicesinc.com

Location Map

Kingsland Business Park
Camden County, Georgia

Project: ES08021.00

Date: May 2008

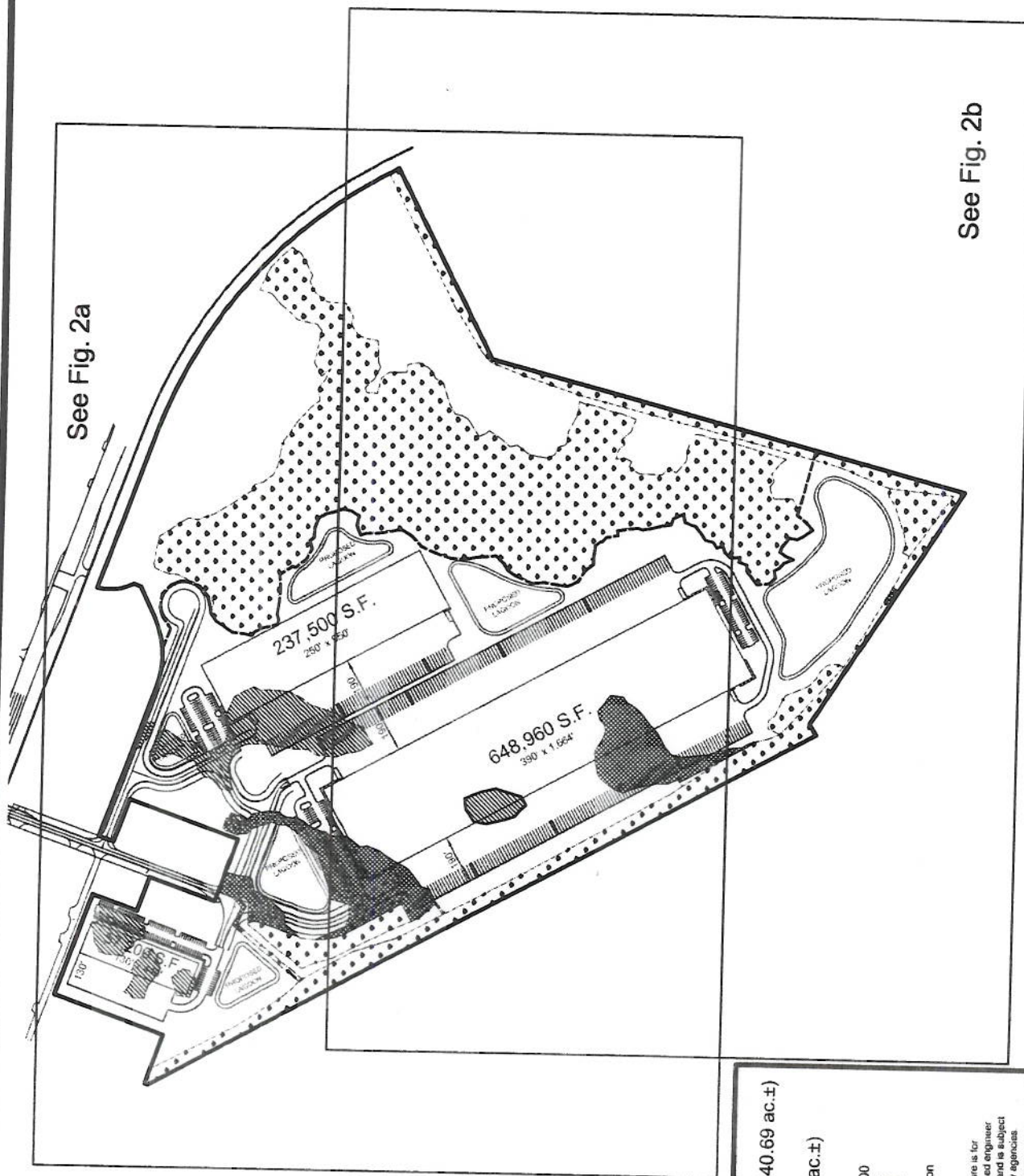
Drwn/Chkd: TS/MD

Figure: 1



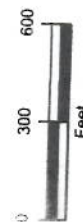
See Fig. 2a

See Fig. 2b



□ Property Boundary (140.69 ac.±)

□ Project Limits (87.88 ac.±)



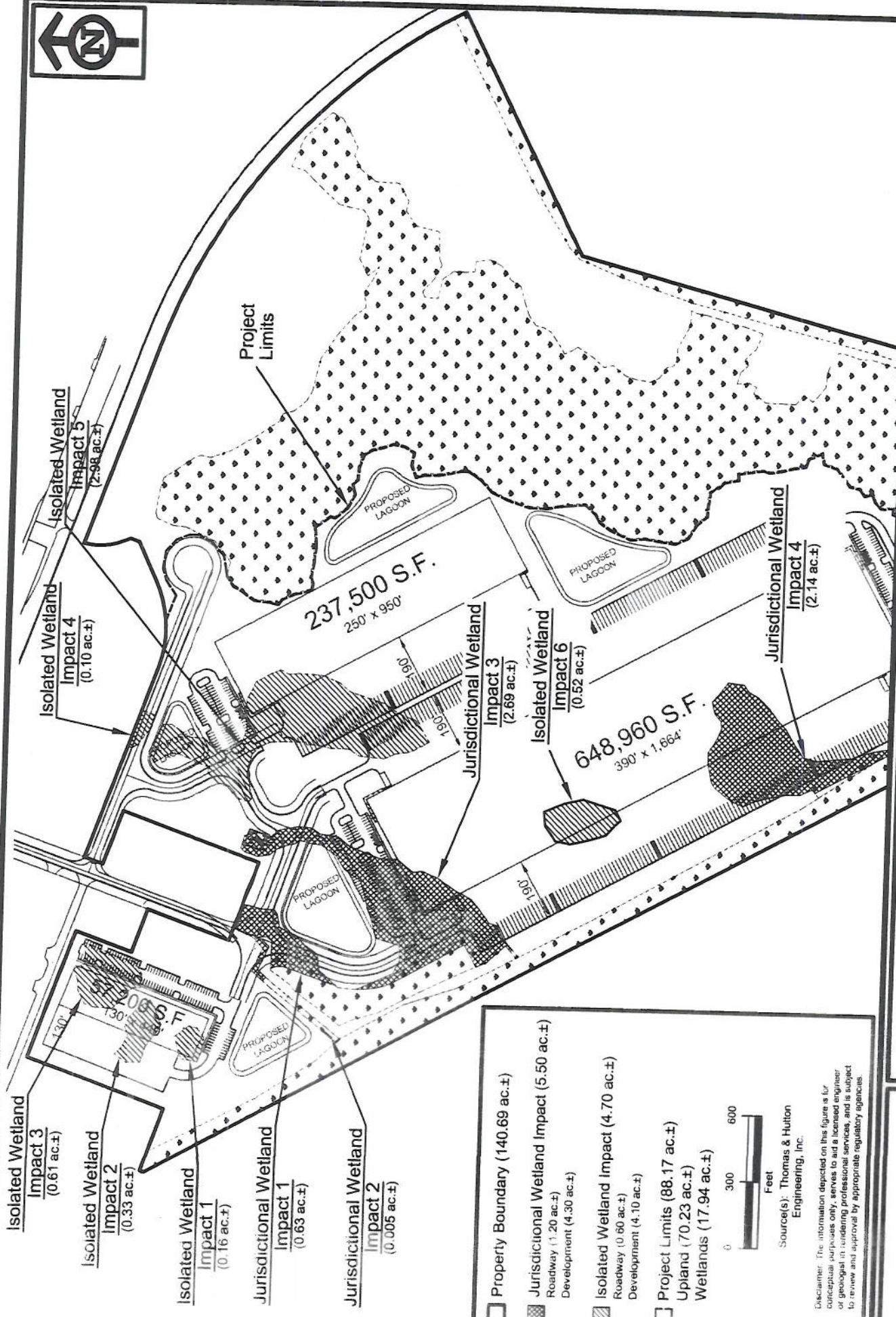
Source(s): Thomas & Hutton Engineering, Inc.

Disclaimer: The information depicted on this figure is for conceptual purposes only, serves to aid a licensed engineer or geologist in rendering professional services, and is subject to review and approval by appropriate regulatory agencies.

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Proposed Site Conditions Key Map
Kingsland Business Park
 Camden County, Georgia

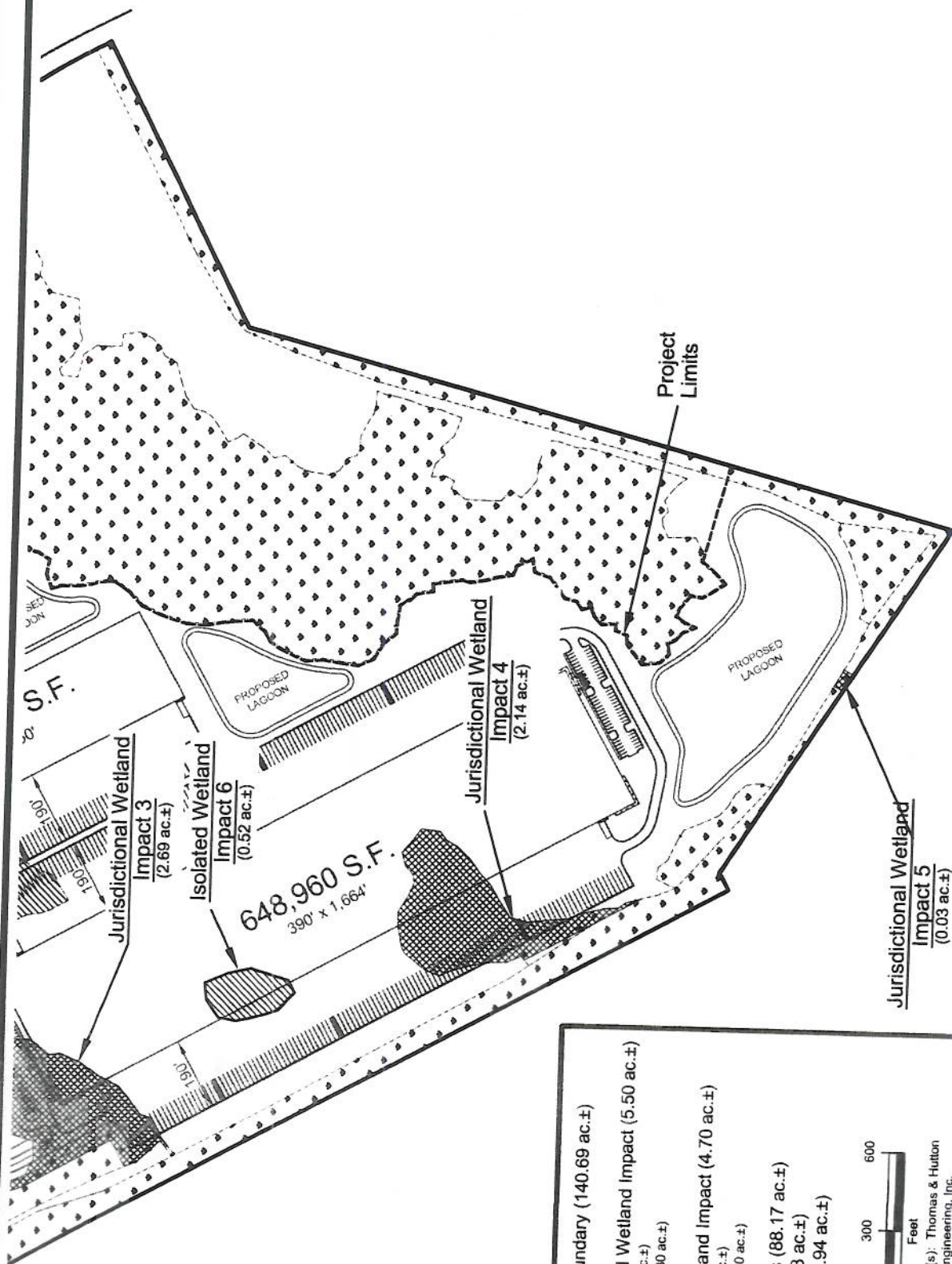
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| Project: | ES08021.04 |
| Date: | Oct. 2008 |
| Dwn/Chkd: | PG/JRN |
| Figure: | 2 |



| | |
|------------|------------|
| Project: | ES08021.04 |
| Date: | Oct. 2008 |
| Drwn/Chkd: | PG/JRN |
| Figure: | 2a |

Proposed Site Conditions Map
Kingsland Business Park
Camden County, Georgia

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- Property Boundary (140.69 ac.±)
- Jurisdictional Wetland Impact (5.50 ac.±)
Roadway (1.20 ac.±)
Development (4.30 ac.±)
- Isolated Wetland Impact (4.70 ac.±)
Roadway (0.60 ac.±)
Development (4.10 ac.±)
- Project Limits (88.17 ac.±)
Upland (70.23 ac.±)
Wetlands (17.94 ac.±)



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Proposed Site Conditions Map Kingsland Business Park Camden County, Georgia

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| Figure: | 2b |